



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

Reply To
Attn Of: OAQ-107

Ms. Katherine Garrison
Hexcel Corporation
P.O. Box 97004
Kent, Washington 98064-9704

Dear Ms. Garrison:

This letter is in response to your correspondence dated August 7, 1998, requesting an applicability determination for Hexcel Interiors, Kent Stowbin Group, to determine whether or not certain manufacturing operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Aerospace Manufacturing and Rework Facilities, 40 CFR Part 63, Subpart GG. Specifically, you asked if stowbins (luggage compartments), interior doors and doorway liners, and flight deck liners (composite panels for the inside of a cockpit, including the "dashboard") would be considered "critical to the structural integrity or flight performance of an airplane." These are all finished components that Hexcel Interiors manufactures for the interior of both new and refurbished airplanes.

Section 63.741(f), regarding the applicability and designation of affected sources, states that the requirements do not apply to parts and assemblies not critical to the vehicles' structural integrity or flight performance. Therefore, if these three areas are not "critical," then they would be exempt from the Aerospace NESHAP. EPA has determined that the stowbins and doors and doorway liners are **not** critical to flight performance so are not subject to this rule. Additionally, EPA has determined that flight deck liners are **not** critical to flight performance since they are used for aesthetic purposes. Therefore, they also are not subject to the Aerospace NESHAP.

If you have any questions, please contact Andrea Wullenweber at (206) 553-8760.

Sincerely,

Douglas E. Hardesty
Federal & Delegated Programs Unit

AW:DEH:cb

cc: Maggie Corbin, PSAPCA
Jim Szykman, EPA OAQPS

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CONCURRENCES						
Initials:						
Name:						
Date:						